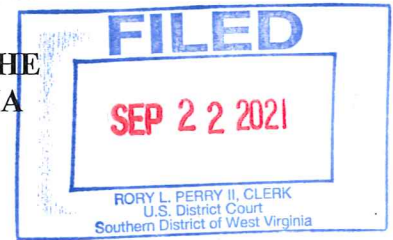


UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY GRAND JURY 2021
SEPTEMBER 22, 2021 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:21-cr-00160

18 U.S.C. § 1349

18 U.S.C. § 1343

18 U.S.C. § 2314

JULIO HISAEL ALMONTE

INDICTMENT

The Grand Jury Charges:

COUNT ONE

(Conspiracy to Commit Wire Fraud)

Introduction

At all times relevant to this Indictment:

1. JULIO HISAEL ALMONTE was a resident of the State of New York.
2. Todd Judy Ford was a dealer of new and used automobiles in Charleston, Kanawha County, West Virginia.
3. Bert Wolfe Toyota was a dealer of new and used automobiles in Charleston, Kanawha County, West Virginia.
4. RouteOne LLC ("RouteOne") was a firm engaged in the business of credit aggregation and electronic contracting services to automotive dealerships and financial institutions. During the month of June 2018, RouteOne's production servers were physically located in Plano, Texas.

The Conspiracy and Scheme and Artifice to Defraud

5. In or about June 2018, at or near Charleston, Kanawha County, West Virginia, within the Southern District of West Virginia, and elsewhere, defendant JULIO HISAEL ALMONTE and another person referred to by defendant as “O”, whose true identity is unknown to the Grand Jury (hereinafter “O”), knowingly and willfully conspired together and with other persons both known and unknown to the Grand Jury to devise, execute and attempt to execute a scheme and artifice to defraud Todd Judy Ford, Wells Fargo Dealer Services, Bert Wolfe Toyota, BB&T Bank, and others (“the Automotive Entities”) to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and caused the transmission of certain writings and signals in interstate commerce for the purpose of executing such scheme or artifice in violation of Title 18, United States Code, Section 1343.

Manner and Means of Conspiracy and Scheme to Defraud

6. It was part of the scheme to defraud that defendant JULIO HISAEL ALMONTE and “O” would obtain from an unknown source or sources means of identification belonging to individuals located throughout the United States (collectively “the identity theft victims”).

7. It was further part of the conspiracy and scheme to defraud that defendant JULIO HISAEL ALMONTE and “O” would create or obtain false identification documents containing the identity theft victims’ means of identification and bearing a picture of “O”.

8. It was further part of the conspiracy and scheme to defraud that defendant JULIO HISAEL ALMONTE and “O” would travel from New York and elsewhere to Charleston, Kanawha County, West Virginia, and “O” would visit car dealerships in Charleston, pose as an identity theft victim, apply for and obtain financing to purchase new trucks using the identity theft victim’s means of identification, and purchase new trucks.

9. In furtherance of the conspiracy, and to effect the objects thereof, defendant JULIO HISAEL ALMONTE and “O” committed the following overt acts in the Southern District of West Virginia and elsewhere:

A. At some date on or before June 28, 2018, defendant JULIO HISAEL ALMONTE and “O” obtained means of identification of D.F., an Ohio resident, and obtained a forged Ohio driver’s license containing D.F.’s information and “O’s” photograph (“the fraudulent D.F. license”).

B. On June 28, 2018, “O” used the fraudulent D.F. license and D.F.’s means of identification to complete and submit a credit application, obtain a total of \$76,196.76 in credit, and purchase a truck from Todd Judy Ford in Charleston, West Virginia.

C. On or about June 28, 2018, defendant JULIO HISAEL ALMONTE sent “O” text messages, using WhatsApp, containing D.F.’s means of identification. “O” sent JULIO HISAEL ALMONTE messages updating him on the status of the purchase of the truck from Todd Judy Ford.

D. At some date on or before June 29, 2018, defendant JULIO HISAEL ALMONTE and “O” obtained means of identification of A.F., an Ohio resident, and obtained a forged Ohio driver’s license containing A.F.’s information and “O’s” photograph (“the fraudulent A.F. license”).

E. On June 29, 2018, “O” used the fraudulent A.F. license and A.F.’s means of identification to complete and submit a credit application, obtain a total of \$42,375.03 in credit, and purchase a truck from Bert Wolfe Toyota in Charleston, West Virginia.

F. On or about June 29, 2018, defendant JULIO HISAEL ALMONTE sent “O” text messages, using WhatsApp, containing A.F.’s means of identification. “O” sent JULIO HISAEL ALMONTE messages updating him on the status of the purchase of the truck from Bert Wolfe Toyota.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO
(Wire Fraud)

10. Paragraphs 1 through 9 are incorporated by reference herein.

11. On or about June 28, 2018, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia and elsewhere, defendant JULIO HISAEL ALMONTE and "O", having devised and intended to devise the above-described scheme to defraud, and for the purpose of executing and attempting to execute the scheme to defraud, did cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, signals, pictures, and sounds, to wit, an electronic credit application, sent via the internet, containing D.F.'s means of identification to RouteOne to obtain \$76,196.76 in purchase credit for a Ford F150 Raptor truck, sent from Todd Judy Ford in Charleston, Kanawha County, West Virginia, to RouteOne's server in Plano, Texas.

All in violation of Title 18, United States Code, Section 1343.

COUNT THREE
(Wire Fraud)

12. Paragraphs 1 through 9 are incorporated by reference herein.

13. On or about June 29, 2018, at or near Charleston, Kanawha County, West Virginia, within the Southern District of West Virginia and elsewhere, defendant JULIO HISAEL ALMONTE and "O", having devised and intended to devise the above-described scheme to defraud, and for the purpose of executing and attempting to execute the scheme to defraud, did cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs, signals, pictures, and sounds, to wit, an electronic credit application, sent via the internet, containing A.F.'s means of identification to RouteOne to obtain \$42,375.03 in purchase credit for a Toyota Tacoma truck, sent from Bert Wolfe Toyota in Charleston, Kanawha County, West Virginia, to RouteOne's server in Plano, Texas.

All in violation of Title 18, United States Code, Section 1343.

COUNT FOUR

(Attempted Transportation of Stolen Property in Interstate Commerce)

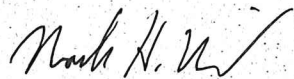
14. Paragraphs 1 through 9 are incorporated by reference herein.

15. On or about June 30, 2018, at or near Charleston, Kanawha County, West Virginia, within the Southern District of West Virginia, and elsewhere, defendant JULIO HISAEL ALMONTE, did unlawfully attempt to transport, transmit, and transfer in interstate commerce from Charleston, Kanawha County, West Virginia, to the State of New Jersey, stolen goods, wares, and merchandise with a value of \$5,000 or more; that is, a 2018 Ford F150 Raptor truck with an approximate value of \$67,250.00, belonging to Todd Judy Ford of Charleston, Kanawha County, West Virginia, knowing the same to have been stolen, converted, and taken by fraud.

In violation of Title 18, United States Code, Section 2314.

LISA G. JOHNSTON
Acting United States Attorney

By:



NOWLES H. HEINRICH
Assistant United States Attorney